



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3690

EPA Region 5 Records Ctr.



233961

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Jack Sorenson
Manager
Suburban Self Storage
2333 Wisconsin Avenue
Downers Grove, Illinois 60515

2333 Wisconsin

Re: Visual Site Inspection
Suburban Self Storage Facility
(Formerly Liberty Copper and Wire
Company Facility)
Downers Grove, Illinois
ILD 047 033 188

Dear Mr. Sorenson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

ATTACHMENT 1



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**SUBURBAN SELF STORAGE FACILITY
(FORMERLY LIBERTY COPPER AND
WIRE COMPANY FACILITY)
DOWNERS GROVE, ILLINOIS
ILD 047 033 188**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 047 033 188
Date Prepared	:	March 2, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL5U
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- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
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LIST OF WITHHELD DOCUMENTS

I have reviewed the documents in the Illinois Environmental Protection Agency, Division of Land Pollution Control, File No. 10430300005 -- San Jose County

Facility Name: Liberty Copper & Wire

and, consistent with the obligations of the Agency under Section 7 of the Environmental Protection Act and the Illinois Freedom of Information Act, I have removed the following documents from the file and inserted such documents in an envelope marked "Withheld Documents".

Document Date	General Description of Document	Reason for Withholding
1. <u>12-24-87</u>	<u>Memo: Chuck Huntman to Harry King Privileged Information 160.202(b)</u>	
2. <u>12-24-87</u>	<u>Memo: Charles Huntman to Permit Section Internal Communication 160.202(c)</u>	
3. <u>4-28-86</u>	<u>TSD Initial Screening</u>	
4. <u>7-4-87</u>	<u>PAV - [unclear] - [unclear]</u>	<u>Exempt - 160.202(b)</u>
5. <u>7-4-87</u>	<u>PAV - [unclear] - [unclear]</u>	<u>Exempt - 160.202(b)</u>
6. _____	_____	_____
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13. _____	_____	_____
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15. _____	_____	_____

Donna De La
(Signature)

10-14-88
(Date)

I have reviewed only documents to update this file, not the entire contents, and I have removed the following numbered documents: _____

(Signature)

(Date)

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Suburban Self Storage (SSS), facility (formerly the Liberty Copper and Wire Company facility) in the Village of Downers Grove (Downers Grove), Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition applies to the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other information needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the SSS facility (EPA Identification No. ILD 047 033 188) in Downers Grove, DuPage County, Illinois. The PA was completed on September 3, 1992. Dynamac gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) offices in Springfield, Illinois, and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), and the U.S. Geological Survey (USGS).

Valerie Farrell and Russ Crittenden of Dynamac conducted the VSI on November 3, 1992. It included an interview with a facility representative and a walk-through inspection of the facility. Dynamac identified four SWMUs and no AOCs at the facility.

Dynco 2011 completed EPA Form 2070-12 using information gathered during the PA VSI. The VSI is included in Attachment A. The VSI is summarized and three inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The SSS facility is located at 2333 Wisconsin Avenue, in Downers Grove, DuPage County, Illinois. Figure 1 shows the location of the facility in relation to surrounding topographic features (latitude 41° 47' 20" N and longitude 88° 02' 00" W)(USGS, 1962 and Liberty, 1980b). The facility occupies approximately 3 acres in the Ellsworth Business Park, which is surrounded by mixed commercial and residential area.

The facility is bordered on the north by Wisconsin Avenue followed by commercial office buildings; on the west by Janes Street followed by Bearing Fasteners, Inc., Data Processing Center; on the south by Inverness Avenue followed by residences; and on the east by a Tricon, Inc., manufacturing facility.

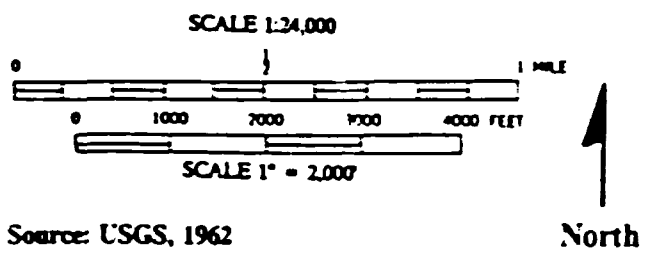
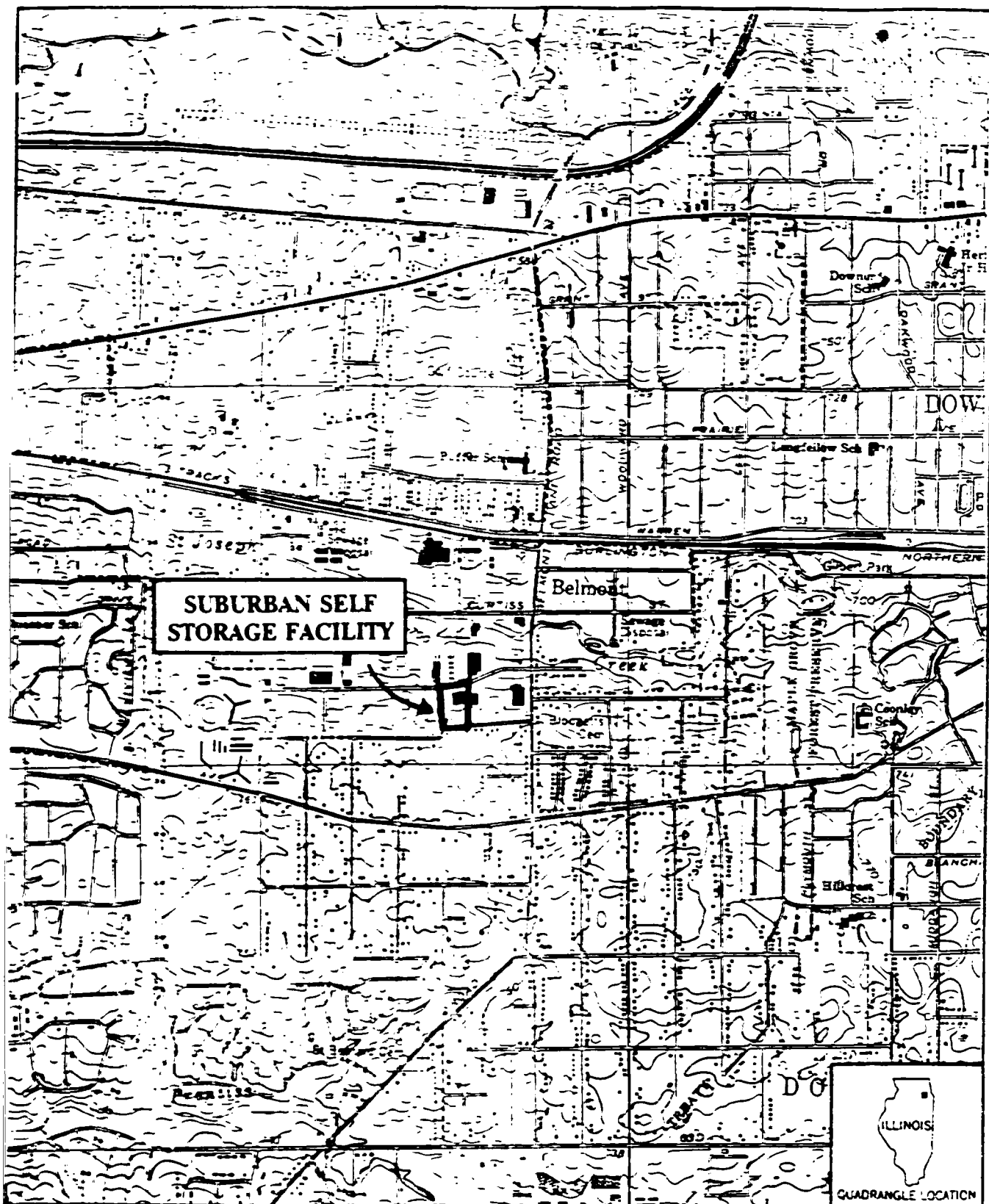
2.2 FACILITY OPERATIONS

Since approximately June 1987, the facility has been owned and operated by SSS. SSS leases individual storage lockers to customers and leases a large warehouse space to American Telephone and Telegraph (AT&T). SSS and AT&T do not conduct any manufacturing operations or generate any waste containing hazardous constituents at this facility.

In 1990, SSS added a 19,000-square-foot addition to the west side of the facility building. The facility currently consists of an 84,550-square-foot building and an 43,000-square-foot outdoor paved parking area. SSS stores all goods inside the building and employs four people at this facility.

From approximately 1960 to 1986, the facility was operated by Liberty Copper and Wire Company (Liberty). Liberty manufactured copper wire for electrical purposes; operations included drawing, enamel coating, and electroplating. Finished products and raw materials such as solvents, plating bath solutions, and coatings were stored in 55-gallon drums inside the building.

From approximately 1960 to 1984, Liberty was a wholly-owned subsidiary of Litton Industries, Inc. (Litton). In 1984, Litton sold all of Liberty's assets to MagneTek, Inc. (MagneTek). Liberty continued operations as a wholly-owned subsidiary of MagneTek until manufacturing operations ceased at this location in 1986.



Source: USGS, 1962

FIGURE 1
FACILITY LOCATION
SUBURBAN SELF STORAGE FACILITY
DOWNERS GROVE, ILLINOIS

Detailed information regarding past operations was not available in EPA or IEPA files at the time of the PA/VSI. In addition, the Magna Tek representative contacted by Dynamac was unable to obtain files associated with Liberty.

Solid wastes generated from former facility operations and SWMUs where they were managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

SSS does not and has not generated or managed any hazardous waste at this facility. The only waste currently generated at the facility is nonhazardous municipal trash. Prior to 1986, the facility generated waste enamel and solvent (F003, F004, F005, D001), electroplating sludge (F006), waste phenol (U188), waste urethane (U238), and electroplating wash water (Liberty, 1980b).

Prior to 1986, wastes were generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes, are discussed below.

Prior to 1986, Liberty generated waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001) from coating and clean-up operations and from the disposal of off-specification coating mixtures. The waste was collected in 55-gallon steel drums and stored in the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3). In 1985, Liberty generated approximately 9,000 pounds of waste enamel and solvent. This waste was shipped off site by Aqua-Tech, Inc., of Port Washington, Wisconsin, to Seaboard Chemical in Jamestown, North Carolina, for fuel blending (Liberty, 1980b and Liberty, 1986b).

Prior to 1985, Liberty generated electroplating sludge (F006) during the clean-out of the electroplating baths at the facility. Liberty employees periodically shoveled the sludge from the baths into 55-gallon steel drums. The drums were stored in the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3). According to Liberty's Part A permit application (Part A), the facility generated approximately 7,650 pounds of this waste per year. Information regarding the transporter, treatment, storage, or disposal (TSD) facility, and ultimate disposition of this waste was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Prior to 1986, Liberty used phenol and urethane in the mixing of enamel coatings and occasionally generated waste phenol (U188) and waste urethane (U238) from the disposal

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit^a	Status
1	Former Outdoor Drummed Waste Storage Area	Yes	Inactive since 1986; RCRA closed in 1987.
2	Former Indoor Drummed Waste Storage Area West	Yes ^b	Inactive since 1986; removed in 1987.
3	Former Indoor Drummed Waste Storage Area East	Yes ^c	Inactive since 1986; RCRA closed in 1987.
4	Former Neutralization Tank	No	Inactive since 1986; removed in 1987.

Notes:

- ^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.
- ^b Although this unit was identified on Liberty's Part A as a RCRA hazardous waste management unit, it was not included on the facility's approved closure plan and did not undergo RCRA closure. According to a 1987 closure verification inspection report, facility representatives stated that the unit did not manage hazardous waste, but was used solely for raw material storage (IEPA, 1987b).
- ^c Although this unit was not identified on Liberty's Part A as a RCRA hazardous waste management unit, it was included in the facility's approved closure plan and underwent RCRA closure activities in 1987 (IEPA, 1987b).

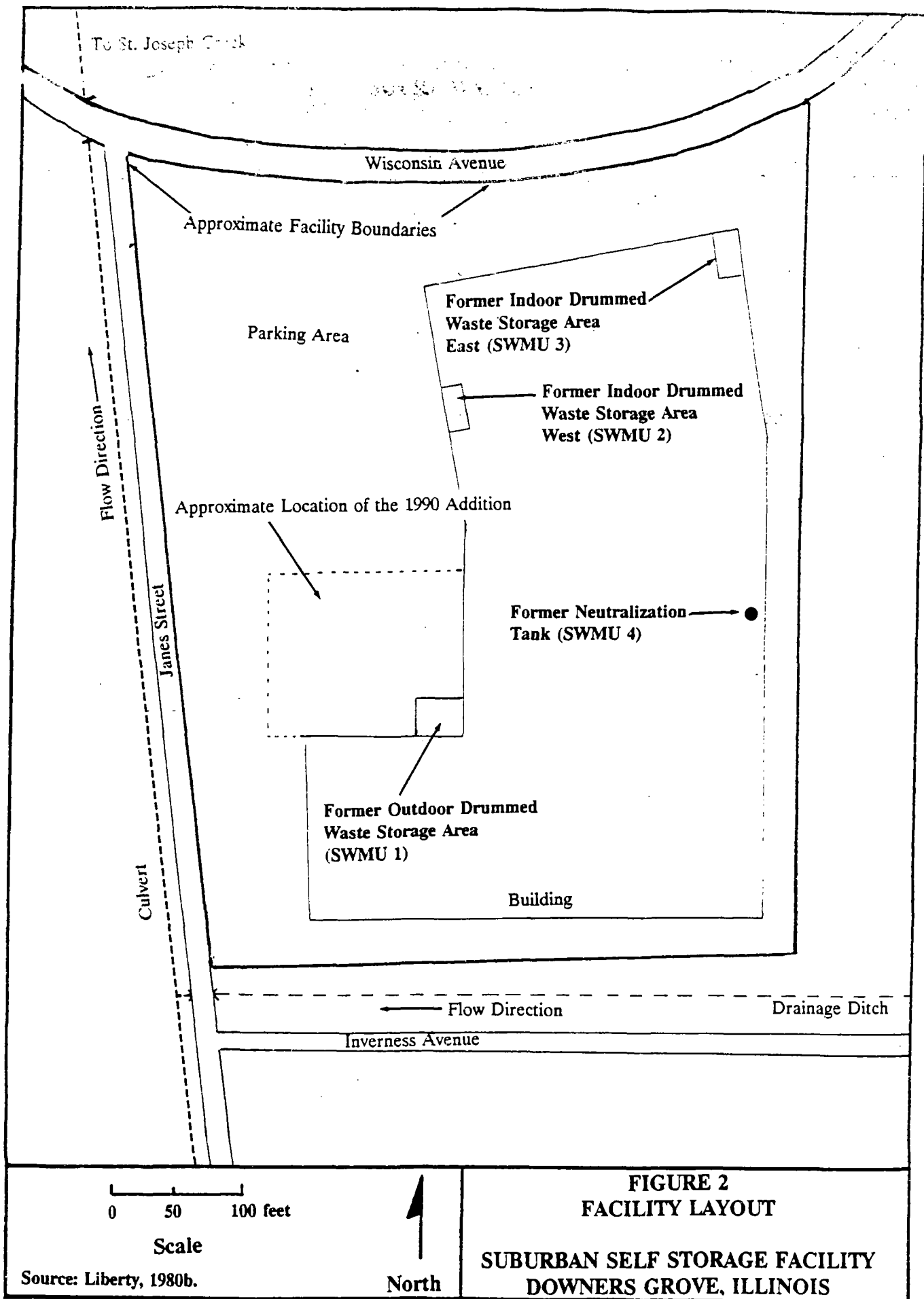


TABLE 2
SOLID WASTE

Waste/EPA Waste Code	Source	Solid Waste Management Unit
Waste Enamel and Solvent (F003, F004, F005, D001)	Coating and clean-up operations and disposal of off-specification coating mixtures.	1 and 3
Electroplating Sludge/ (F006)	Electroplating operation	1 and 3
Waste Phenol/(U188)	Disposal of off-specification product	1 and 3
Waste Urethane/(U238)	Disposal of off-specification product	1 and 3
Electroplating wash water *	Electroplating operation	4

Note:

- * Information regarding the constituents of the electroplating wash water was not available in EPA, IEPA, or facility files at the time of the PA/VSI. This waste was pre-treated prior to discharge via the sanitary sewer to the Downers Grove Sanitary District publicly owned treatment works (POTW) (Liberty, 1984).

of off-specification products. The wastes were accumulated in 55-gallon drums and stored in the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3). According to Liberty's Part A, the facility generated 200 pounds of waste phenol (U188) and 400 pounds of waste urethane (U238) per year (Liberty, 1980b). Information regarding the transporter, TSD facility, and ultimate disposition of these wastes was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Prior to 1985, Liberty generated electroplating wash water from a rinsing process associated with the electroplating operation at the facility (Liberty, 1984). Specific information regarding the constituents, generation, and management of this waste was not available in EPA, IEPA, or facility files at the time of the PA/VSI. According to a Compliance Inquiry Letter (CIL) from IEPA to Liberty, the pH of the electroplating wash water was adjusted in the Former Neutralization Tank (SWMU 4) (IEPA, 1985b). The pre-treated water was then discharged via the sanitary sewer to the Downers Grove Sanitary District POTW (Liberty, 1984).

2.4 HISTORY OF DOCUMENTED RELEASES

During RCRA closure activities in 1987, Liberty documented soil contaminated with up to 57,100 parts per million (ppm) of xylene under the cracked portion of the concrete pad associated with the Former Outdoor Drummed Waste Storage Area (SWMU 1). Liberty submitted analytical results of soil samples collected in the vicinity of SWMU 1 and certification of closure from a registered Professional Engineer to the IEPA on March 2, 1987. According to a letter from IEPA to Liberty, analysis of soil samples indicated that the contamination was confined to the upper two feet of soil (IEPA, 1987a). Although information regarding whether the contaminated soil was ever removed was not available in EPA, IEPA, or facility files, IEPA approved RCRA closure activities at this unit in 1987.

2.5 REGULATORY HISTORY

Liberty submitted a Notification of Hazardous Waste Activity (Notification) form to EPA on July 30, 1980 (Liberty, 1980a). Liberty submitted a Part A to EPA on December 31, 1980, identifying the facility as a generator and storage facility. The Part A listed the following process codes and capacities: a container storage (S01) capacity of 2,000 gallons and a tank treatment (T01) capacity of 400 gallons per day. The Part A also listed the facility as generating the following waste codes and estimated annual quantities: 3,800 pounds of (F003) waste; 3,600 pounds of (F004) waste; 1,600 pounds of (F005) waste; 2,000 pounds of (F006) waste; 400 pounds of (F007) waste; 1,000 pounds of (F008) waste; 4,250 pounds of (F009) waste; 200 pounds of (U188) waste; and 400 pounds of (U238) waste (Liberty, 1980b).

The 2,000-gallon S01 unit referred to both the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area West

(SWMU 2). The 400-gallon unit referred to the Former Neutralization Tank (SWMU 4). Although Liberty's Part A erroneously listed the Part A facility combined all of the coating wastes and managed them as a single waste stream (waste enamel and solvent (F003, F004, F005, D001)) and all of the electroplating wastes and managed them as a single waste stream (electroplating sludge (F006)). According to a January 1982 RCRA inspection report, the facility listed F007, F008, and F009 on the Part A erroneously because it did not use cyanide in the plating solutions (IEPA, 1982).

According to a 1986 letter from IEPA to Liberty, the Former Neutralization Tank (SWMU 4) was identified on Liberty's Part A erroneously because it was a wastewater pre-treatment unit and was therefore exempt from regulation under RCRA (IEPA, 1986a and IEPA, 1987a). Although the Former Indoor Drummed Waste Storage Area East (SWMU 3) was not identified on the facility's Part A, it was used for the storage of 55-gallon drums containing hazardous waste (IEPA, 1987a).

Liberty submitted a closure plan for the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3) to IEPA on January 10, 1986. IEPA approved the facility's closure plan on June 9, 1986 (IEPA, 1986a). On December 1, 1986, Liberty ceased all manufacturing operations at the facility and began closure activities. During closure activities, Liberty documented soil contaminated with xylene under the cracked concrete pad at SWMU 1. Liberty submitted analytical results of soil samples collected in the vicinity of SWMU 1 and certification of closure from a registered Professional Engineer to the IEPA on March 2, 1987. According to a letter from IEPA to Liberty, analysis of soil samples indicated that the contamination was confined to the upper two feet of soil (IEPA, 1987a). Information regarding whether the contaminated soil was ever removed was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

According to a December 17, 1987, closure verification inspection report, the facility conducted closure activities for the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3) in accordance with the facility's approved closure plan. The inspection report states that the Former Indoor Drummed Waste Storage Area West (SWMU 2) was not included in the facility's closure plan and did not undergo RCRA closure. The inspection report also indicates that at the time of the inspection, the Liberty representative stated that SWMU 2 was never used to store hazardous wastes, but was only used solely for raw material storage (IEPA, 1987b). Additional information regarding closure activities was not available in EPA, IEPA, or facility files at the time of the PA/VSI. According to Warren Weritz of IEPA, the facility is not currently regulated under RCRA (Dynamac, 1992b).

In October 1982, EPA issued a Consent Agreement and Final Order (CAFO) to Liberty because they did not submit a Part A to EPA by November 19, 1980, and were therefore, operating a hazardous waste management facility without a permit or interim status (EPA, 1982). By signing the CAFO, Liberty achieved interim status. The facility

operated under interim status from 1982 to 1986 when they submitted a closure plan and a request to withdraw the Part A. Liberty subsequently submitted a letter to IEPA indicating that the facility was not operating as a storage facility and requested that the Part A be withdrawn (Liberty, 1986a).

IEPA conducted RCRA inspections at the facility in January 1982 and November 1985 and identified apparent violations and deficiencies in paper work related to the following areas: the waste analysis plan; personnel training records; the contingency plan; the operating record; the closure plan and closure cost estimate (IEPA, 1982 and IEPA, 1985a).

According to a February 19, 1986, IEPA memorandum to the Liberty file, a Pre-Enforcement Compliance Conference was conducted between IEPA and Liberty. The conference outlined the apparent violations identified during the November 1985 RCRA inspection, and developed a plan and schedule to bring the facility into compliance (IEPA, 1986b). Although information regarding whether the facility resolved the apparent violations was not available in EPA, IEPA, or facility files, the facility is not currently regulated under RCRA.

There is no documentation in EPA, MagneTek, or facility files regarding whether the facility was required to have an air operating permit. In addition, the IEPA Division of Air Pollution Control did not have any file information pertaining to the facility.

The facility did not discharge to any open waterways and was therefore not required to have a National Pollutant Discharge Elimination System (NPDES) permit. The facility did have a permit (Permit No. 33IL0028380) to discharge pre-treated wastewater from the Former Neutralization Tank (SWMU 4) to the Downers Grove Sanitary District POTW via the sanitary sewer system. According to a July 1984, letter from Liberty to EPA, the facility conducted periodic monitoring of the discharge and was within the effluent limitations of the permit (Liberty, 1984). There was no documentation of violations associated with the wastewater discharge in EPA, IEPA, MagneTek, or facility files at the time of the PA/VSI.

There is no documentation in EPA, IEPA, Magnetek, or facility files of any Superfund (CERCLA) activity at the facility. In addition, there is no documentation of any underground storage tanks (UST) at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the SSS facility.

2.6.1 Climate

The facility is located approximately 10 miles southwest of O'Hare International Airport, the nearest National Weather Service station. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located approximately 18 miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2 degrees Fahrenheit (°F). The highest average daily temperature is 73.0 °F in July, and the lowest average daily temperature is 21.4 °F in January (NOAA, 1990).

Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The one-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at an average of 12 miles per hour from the west-southwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The SSS facility is located in an area of minimal flooding, outside the 100-year or 500-year flood plain of any surface water body (FEMA, 1981). The nearest surface water body, St. Joseph Creek, is located approximately 0.25 mile north of the facility and is used for storm water collection (Dynamac, 1992a). St. Joseph Creek flows west and discharges to the East Branch of the DuPage River (USGS, 1962).

Surface water runoff at the facility is towards a drainage ditch located on the south side of the facility. The drainage ditch flows west towards a culvert located on the west side of Janes Street. The culvert flows north and discharges to St. Joseph Creek approximately 0.25 mile north of the facility (IEPA, 1980 and Dynamac, 1992a).

2.6.3 Geology and Soils

The soils of the SSS facility are mapped as Urban land/Orthents Complex. This soil group consists of clayey soils that have been altered or mixed as a result of urban development. Nearby soil areas are mapped as Markham silt loam and Ashkum silty clay loam, either alone or in complexes with urban land. The Markham silt loam is a deep, moderately well drained, moderately slowly permeable soil developed in thin loess on upland till plains. The Ashkum silty clay loam is a deep, poorly drained, moderately slowly permeable soil also developed in thin loess on upland till plains (SCS, 1979).

The surficial deposits surrounding the area of the SSS facility are mapped as the Wadsworth Till Member of the Wedron Formation. The Wadsworth Till is a thick and extensive, gray silty clay loam glacial till with few pebbles and cobbles. Some isolated lenses of sand and gravel may be present in the subsurface of the till (Lineback, 1979). The total thickness of the glacial deposits is approximately 85 feet in the area of the facility (Willman, 1971).

The bedrock underlying the glacial deposits at the SSS facility consists of Silurian-age dolomite. The dolomite is approximately 150 feet thick in this area and includes portions of the Niagaran and Alexandrian Series dolomites. The Niagaran Series dolomite is largely composed of massive reef complexes of pure dolomite separated by zones of silty, argillaceous and cherty dolomite. The Alexandrian Series dolomites are well bedded, generally white or gray with cherty zones and occasional green or red shaly beds. Underlying these dolomites is the Ordovician-age Maquoketa Shale, which is red and oolitic at the top, and greenish gray and dolomitic at depth. The Maquoketa Shale is approximately 180 feet thick. Several thousand feet of Ordovician-age and Cambrian-age dolomites and sandstones underlie the Maquoketa Shale (Willman, 1971).

2.6.4 Ground Water

No ground water information specific to the SSS facility was available at the time of the PA/VSI. Regionally, there are three aquifers: 1) a drift aquifer, 2) a shallow bedrock aquifer, and 3) a deep bedrock aquifer. The drift aquifer is limited to occasional sand and gravel lenses. The depth to ground water is not documented but is likely to be at approximately 25 feet below ground surface (bgs), corresponding to the elevation of St. Joseph Creek. Since St. Joseph Creek is a likely discharge area for the surficial aquifer, ground water flow in this aquifer is probably to the north. The drift aquifer is hydraulically connected to the underlying Silurian-age Dolomite, which comprises the shallow bedrock aquifer. The dolomite aquifer has variable characteristics due to variations in fracturing and solution openings. The shallow bedrock aquifer is approximately 150 feet thick, and is underlain by the Maquoketa Shale. Ground-water flow direction in the shallow bedrock aquifer is regionally to the east in this area. The deep bedrock aquifer underlies the Maquoketa Shale and comprises the Ordovician-age and Cambrian-age dolomites and sandstones. The Maquoketa Shale serves as a confining layer over the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). There are no monitoring wells at the facility. Regionally, ground water in the deep bedrock aquifer flows to the east (Schicht, Adams, and Stall, 1976).

Although the majority of Downers Grove receives drinking water from Lake Michigan via the DuPage County Water Commission, there are three smaller municipal water systems located on the periphery of the Downers Grove water supply boundaries that obtain drinking water from ground water wells (Dynamac, 1992a). The nearest of these systems is the Belmont-Highwood System which maintains one operating well and one back-up well and serves approximately 165 residences. The nearest well, the operating well, is located approximately 1,000 feet east of the facility. This well is most likely downgradient of the facility (USGS, 1962). According to Robert Tully of the Belmont-Highwood System, there are some private wells located approximately 0.75 mile north of the facility (Dynamac, 1992c). Information regarding the exact location of private wells was not available at the time of the PA/VSI.

2.7 RECEPTORS

The facility occupies approximately 3 acres in the Ellsworth Business Park, which is surrounded by a mixed commercial and residential area in Downers Grove, Illinois, which had a 1990 population of 43,858 people (State of Illinois, 1991).

The facility is bordered on the north by Wisconsin Avenue followed by commercial office buildings; on the west by Janes Street followed by Bearing Fasteners, Inc., Data Processing Center; on the south by Inverness Avenue followed by residences; and on the east by a Tricon, Inc., manufacturing facility. The nearest school, Puffer School, is located approximately 0.75 miles north of the facility. The nearest residences are located 0.25 mile south of the facility on the south side of Inverness Avenue. Although facility access is not restricted by a fence or security system, there are no wastes or raw materials currently stored outdoors, and the facility building is kept locked when not occupied.

The nearest surface water body, St. Joseph Creek, is located approximately 0.25 mile north of the facility and is used for storm water collection (Dynamac, 1992a). St. Joseph Creek flows west and discharges to the East Branch of the DuPage River (USGS, 1962). Surface water runoff at the facility is to the south towards a drainage ditch which discharges to St. Joseph Creek (IEPA, 1980 and Dynamac, 1992a).

Although the majority of Downers Grove receives drinking water from Lake Michigan via the DuPage County Water Commission, there are three smaller municipal water systems located on the periphery of the Downers Grove water supply boundaries that obtain drinking water from ground water wells (Dynamac, 1992a). The nearest of these systems is the Belmont-Highwood System which maintains one operating well and one back-up well and serves approximately 165 people. The nearest well, the operating well, is located approximately 1,000 feet east of the facility. This well is most likely downgradient of the facility (USGS, 1962). According to Robert Tully of the Belmont-Highwood System, there are some private wells located approximately 0.75 mile north of the facility (Dynamac, 1992c). Information regarding the exact location of private wells was not available at the time of the PA/VSI.

The nearest sensitive environment consists of a forested wetland that undergoes brief periods of flooding during the growing season and is dominated by broad leaved deciduous trees. The wetland is approximately 4 acres in size and is located along St. Joseph Creek about 0.33 mile northeast of the facility. There is another wetland located approximately 0.50 mile northwest of the facility that consists of an intermittently exposed, open water pond that is lacking vegetation (USDI, Undated).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Outdoor Drummed Waste Storage Area

Unit Description:

The Former Outdoor Drummed Waste Storage Area was located along the west side of the building and consisted of a 1,172-square-foot concrete pad enclosed by a chain-link fence. The unit was used for the storage of 55-gallon drums containing hazardous waste generated at the facility. Surface water runoff in the vicinity of the unit is collected by a drainage ditch that runs along the south side of the facility and directs water to St. Joseph Creek (IEPA, 1980).

Date of Startup:

This unit began operation at an unknown date prior to 1980.

Date of Closure:

This unit has been inactive since Liberty ceased operations at this facility in 1986. IEPA approve RCRA closure activities at this unit in 1987.

Waste Managed:

This unit managed 55-gallon drums containing some or all of the following hazardous wastes: waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001); electroplating sludge (F006); waste phenol (U188); and waste urethane (U238). The waste enamel and solvent was shipped off site for fuel blending (Liberty, 1986b). Information regarding the ultimate disposition of the electroplating sludge, waste phenol, and waste urethane was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Release Controls:

This unit managed wastes in closed 55-gallons steel drums located outdoors on a concrete pad that was surrounded by a chain-link fence. Information regarding the height of the fence was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

**History of
Documented Releases:**

During RCRA closure activities in 1987, Liberty documented soil contamination with organics at a maximum of 57,100 ppm under the cracked portion of the concrete pad at this unit. According to a letter from IEPA to Liberty, analysis of soil samples indicated that the contamination was confined to the upper two feet of soil (IEPA, 1987a). IEPA approved RCRA closure activities for this unit in 1987. Specific information regarding remediation and closure activities was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Observations:

At the time of the VSI, the area where this unit was formerly located was covered by an addition to the facility building built by SSS in 1990 (See Photo No. 2).

SWMU 2

Former Indoor Drummed Waste Storage Area West

Unit Description:

The Former Indoor Drummed Waste Storage Area West consisted of a 450-square-foot concrete-floored area located indoors near the northwest corner of the building. The Part A indicated that the unit was used to store 55-gallon drums of hazardous waste generated at the facility. According to the 1987 closure verification inspection report, facility representatives stated that this unit was never used to store wastes, but was used solely for raw material storage. The unit has been inactive since Liberty ceased operations at the facility in 1986. There were no floor drains in the area where this unit was formerly located.

Date of Startup:

This unit began operation at an unknown date prior to 1980.

Date of Closure:

This unit has been inactive since operations ceased at this facility in 1986. Although this unit was identified on Liberty's Part A as a RCRA hazardous waste management unit, it was not included on the facility's closure plan and did not undergo RCRA closure activities. According to a December 17, 1987, closure verification inspection report, the facility representative stated that this unit was never used to store hazardous waste, but was used solely for raw material storage (IEPA, 1987b).

Wastes Managed:

This unit did not manage wastes, but was used solely for storage of 55-gallon drums containing raw materials.

Release Controls: This unit managed raw materials and/or wastes in closed 55-gallon steel drums located indoors on a concrete floor with no floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: At the time of the VSI, the concrete-floored area where this unit was formerly located was in sound condition and did not contain any stains or evidence of a previous release (See Photo No. 1).

SWMU 3 Former Indoor Drummed Waste Storage Area East

Unit Description: The Former Indoor Drummed Waste Storage Area East consisted of a concrete-floored area located indoors near the northeast corner of the building. The unit was used to store 55-gallon drums containing hazardous waste generated at the facility. The unit has been inactive since Liberty ceased operations at the facility in 1986. This unit was identified as a SWMU subsequent to the VSI, therefore Dynamac did not observe the area where this unit was located. Information regarding the size and capacity of the unit, and the location of nearby floor drains was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Date of Startup: This unit began operation at an unknown date prior to 1980.

Date of Closure: This unit has been inactive since operations ceased at this facility in 1986. IEPA approved RCRA closure activities at this unit in 1987.

Wastes Managed: This unit managed 55-gallon drums containing some or all of the following hazardous wastes: waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001); electroplating sludge (F006); waste phenol (U188); waste urethane (U238). The waste enamel and solvent was shipped off site for disposal via secondary fuel blending (Liberty, 1986b). Information regarding the ultimate disposition of the electroplating sludge, waste phenol, waste urethane was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Release Controls: This unit managed wastes in closed 55-gallon steel drums located on a concrete floor with no floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: Although this unit was identified as a SWMU based on information obtained subsequent to the VSI, Dynamac did observe the general area where this unit was formerly located. The concrete floor was not cracked or stained and did not show any evidence of the previous use.

SWMU 4 Former Neutralization Tank

Unit Description: The Former Neutralization Tank consisted of a 500-gallon steel tank located on a concrete floor along the east side of the building. The unit was used to adjust the pH of the electroplating wash water generated by a rinsing process associated with the electroplating operation at the facility. There were no floor drains in the area where this unit was formerly located.

Date of Startup: This unit began operation at an unknown date prior to 1980.

Date of Closure: This unit has been inactive since operations ceased at the facility in 1986 and was removed from the facility in 1987. Although this unit was identified on Liberty's Part A as a RCRA hazardous waste management unit, it was a wastewater pre-treatment unit and therefore exempt from regulation under RCRA.

Wastes Managed: This unit managed electroplating wash water generated by a rinsing process associated with the electroplating operation. Specific information regarding the constituents of the waste was not available in EPA, IEPA, or facility files at the time of the PA/VSI. The facility discharged the pre-treated water to the Downers Grove Sanitary District POTW (Liberty, 1984).

Release Controls: This unit was constructed of steel and was located indoors on a concrete floor with no floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations:

Dynaflex did not observe this unit during the VSI because it had been removed from the facility during renovation activities beginning in 1986. The concrete-floored area where this unit was formerly located did not show any evidence of a previous release (See Photo No. 3).

4. AREAS OF CONCERN

Dynamac did not observe any AOCs at the time of the FA/VSI.

REFERENCES

- Dynamac Corporation (Dynamac), 1992a. Telephone conversation between Charlie Fisher of the Village of Downers Grove Water Department and Valerie Farrell of Dynamac, regarding drinking water supplies and the use of St. Joseph Creek, December 8.
- Dynamac, 1992b. Telephone conversation between Warren Weritz of the Illinois Environmental Protection Agency (IEPA) and Valerie Farrell of Dynamac, regarding closure activities and regulatory status of the SSS facility, December 14.
- Dynamac, 1992c. Telephone conversation between Robert Tully of the Belmont-Highwood Water System and Valerie Farrell of Dynamac, regarding drinking water wells in the vicinity of the facility, December 22.
- Federal Emergency Management Agency (FEMA), 1981. Flood insurance rate map for the Village of Downers Grove, DuPage County, Illinois, April 15.
- Hughes, G.M., P. Kraatz, and R.A. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, circular 406.
- Illinois Environmental Protection Agency (IEPA), 1980. Complaint Investigation Form prepared by Cliff Gould, IEPA, regarding surface water run-off at the Liberty facility, October 15.
- IEPA, 1982. RCRA inspection report prepared by Chuck Gruntman of IEPA for the Liberty facility, January 14.
- IEPA, 1985a. RCRA inspection report prepared by Jim Wiggins of IEPA for the Liberty facility, November 26.
- IEPA, 1985b. Compliance Inquiry Letter (CIL) for the Liberty facility prepared by Major Hearn, Jr. of IEPA, December 13.
- IEPA, 1986a. Letter from IEPA to Liberty approving the facility's closure plan, June 9.
- IEPA, 1986b. IEPA memorandum to the file regarding the Pre-Enforcement Compliance Conference for the Liberty facility, February 19.
- IEPA, 1987a. Letter from IEPA to Liberty regarding the RCRA closure activities, documented soil contamination, and required further actions, June 2.

References (Continued)

- IEPA, 1987b. Closure verification inspection report for the Liberty facility prepared by Chuck Gruntman. IEPA, December 17.
- Liberty Copper and Wire Company (Liberty), 1980a. Notification of Hazardous Waste Activity, July 30.
- Liberty, 1980b. Part A permit application (Part A), December 31.
- Liberty, 1984. Letter from Liberty to U.S. EPA regarding wastewater pre-treatment and discharge at the facility, July 19.
- Liberty, 1986a. Letter from Liberty to IEPA requesting that the facility's Part A be withdrawn and the Closure Plan for the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3), January 10.
- Liberty, 1986b. Generator Annual Hazardous Waste Report prepared by Liberty, February 24.
- Lineback, J.A., 1979. Quaternary Deposits in Illinois, Map 1:500,000.
- National Oceanic and Atmospheric Administration (NOAA), 1979. Climatography of the U.S., Asheville, North Carolina.
- NOAA, 1990. Local Climatological Data for O'Hare International Airport, Illinois.
- Schict, R.J., J.R. Adams, and J.B. Stall, 1976. "Water Resources and Availability, Quality, and Cost in Northeastern Illinois." Illinois State Water Survey Report of Investigation 83.
- Soil Conservation Service (SCS), 1979. Soil Survey of DuPage and Part of Cook Counties, Illinois, May.
- State of Illinois, 1991. Official Illinois Highway Map.
- U. S. Department of the Interior (USDI), Undated. National Wetlands Inventory Map, 1:24,000 scale, Wheaton, Illinois Quadrangle. Based on aerial photographs taken in April 1983.
- U. S. Geological Survey (USGS), 1962. 7.5 Minute Series Topographic Map, Wheaton, Illinois Quadrangle, photorevised 1972 and 1980.

REFERENCES (Continued)

U. S. Environmental Protection Agency (EPA), 1982. Consent Agreement and Final Order issued to Liberty for operating a hazardous waste management facility without a permit or interim status, October 19.

Willman, H.B., 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IL 0047 333 188

II. SITE NAME AND LOCATION

01 SITE NAME (If possible, common, or descriptive name of site) Suburban Self Storage Facility		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 2333 Wisconsin Avenue			
03 CITY Downers Grove		04 STATE IL	05 ZIP CODE 60515	06 COUNTY DuPage	07 COUNTY CODE 08 CONG DIST
09 COORDINATES:	LATITUDE 41° 47' 20" N	LONGITUDE 88° 02' 00" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Travel Interstate 55 south to Highland Avenue. Travel Highland Avenue south to U.S. Route 34 west until Belmont Road. Travel Belmont Road south to Wisconsin Avenue. Take a right (west) on Wisconsin Avenue and then take a left (south) into the facility parking lot.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Suburban Self Storage		02 STREET (Business, mailing, residential) 2333 Wisconsin Avenue			
03 CITY Downers Grove		04 STATE IL	05 ZIP CODE 60515	06 TELEPHONE NUMBER (618) 278-0251	
07 OPERATOR (if known and different from owner) Same as above		08 STREET (Business, mailing, residential)			
09 CITY		10 STATE		11 ZIP CODE	12 TELEPHONE NUMBER
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: MONTH DAY YEAR 07 / 30 / 80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 11 / 03 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: (Specify) CONTRACTOR NAME(S): Dynamac Corporation			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1980 / Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED The only waste currently generated at the facility consists of nonhazardous municipal trash.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The facility documented soil contaminated with xylene at 57,100 parts per million under the cracked concrete pad associated with the Former Outdoor Drummed Waste Storage Area (SWMU 1). Analysis of soil samples indicated that contamination was confined to the upper two feet of soil. There is no documentation whether the contaminated soils were removed.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA	03 TELEPHONE NUMBER (312) 886-4448		
04 PERSON RESPONSIBLE FOR ASSESSMENT Valerie Farrell	05 AGENCY	06 ORGANIZATION Dynamac Corporation	07 TELEPHONE NUMBER (312) 486-0222	08 DATE 11 / 03 / 92 MONTH DAY YEAR

ATTACHMENT B

**VISUAL SITE INSPECTION SUMMARY
AND PHOTOGRAPHS**

VISUAL SITE INSPECTION SUMMARY

SUBURBAN SELF STORAGE FACILITY

2333 WISCONSIN AVENUE

DOWNERS GROVE, ILLINOIS 60515

ILD 047 033 188

Date: November 3, 1992

Primary Facility Representative: Jack Sorenson, Manager

Representative Telephone No.: (708) 964-6622

Inspection Team: Valerie Farrell, Dynamac Corporation
Russ Crittenden, Dynamac Corporation

Photographer: Russ Crittenden, Dynamac Corporation

Weather Conditions: Overcast, approximately 40° Fahrenheit

Summary of Activities: The visual site inspection (VSI) began at 9:15 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. The facility representative then discussed the facility's current operations, solid wastes generated, and release history. Suburban Self Storage has been operating at this location since 1987; the only waste currently generated at the facility is nonhazardous municipal trash. The facility representative did not have any information regarding past operations at the facility.

The VSI tour began at approximately 9:45 a.m. The inspection team first walked through the building and observed the area where the Former Indoor Drummed Waste Storage Area West (SWMU 2), the Former Outdoor Drummed Waste Storage Area (SWMU 1), and the Former Neutralization Tank (SWMU 4) were located. The inspection team did not observe the Former Indoor Drummed Waste Storage Area East (SWMU 3) because it was identified as a SWMU based on information received subsequent to the VSI.

The tour concluded at approximately 10:00 a.m., after which the inspection team held an exit meeting with the facility representative. The VSI was completed and the inspection team left the facility at 10:15 a.m.



Photo No.:
Orientation:
Description:

1

West

Former location of the Former Indoor Drummed Waste Storage Area West located near the northwest corner of the building.

Location: SWMU 2

Date: November 3, 1992



Photo No.:
Orientation:
Description:

2

Southeast

Former location of the Former Outdoor Drummed Waste Storage Area located along the west side of the facility. In 1990, SSS built an addition over the area where the unit was formerly located.

Location: SWMU 1

Date: November 3, 1992



Photo No.:	3	Location:	SWMU 4
Orientation:	East	Date:	November 3, 1992
Description:	Former location of the Former Neutralization Tank located along the east side of the building.		

ATTACHMENT C
VISUAL SITE INSPECTION
FIELD NOTES

November 3, 1992

- Former Liberty Copper and Wire Facility
- now "Suburban Self-Storage"
- weather: overcast ~40°F
- Arrive at site @ 9:15 a.m.
- MET WITH JACQ SOLOMON:
- Discussed nature of inspection and general information regarding purchase.
- Purchased facility in approx June '87.
- Built addition in 1990.
- Photo 1 = West: BWSO
- Photo 2 = SE: DWSA under addition
- Photo 3 = E: Neutralization tank.
- Photo 4 = W: oil waste water storage tanks.
- LEFT FACILITY AT APPROX 10:00 a.m.

C. J. J. J.

RIDER

For purposes of this Subpoena, "DuPage County Self Storage Facility" shall refer to Suburban Self Storage Facility and any parent, predecessor, successor, subsidiary or affiliated or related business entity, present and former officers, directors, agents, accountants, attorney(s), employees, other representatives, and all other persons acting or purporting to act its behalf. The following requests seek documents from 1950 to the present.

1. Any and all documents relating to the purchase, transportation, use, storage, or disposal of any chlorinated hydrocarbons, including, but not limited to, tetrachlorethene, tetrachloroethane, trichloroethene, trichloroethane, dichloroethene, dichloroethane, dichloropropene, dichloropropane, vinyl chloride, methylene chloride, and/or chloroform (hereinafter described as "Subject VOCs"), from 1970 to the present. The documents produced in response to this subpoena should include, but not be limited to, test results, manifests, receipts, bills of lading, and agreements, contractual or otherwise. "Document" shall mean every writing and record of every type and description in the company's possession, control, or custody including, but not limited to, correspondence, memoranda, stenographic or handwritten notes, reports, studies, books, pamphlets, laboratory analyses, pictures or voice recordings, or information in electronic form.
2. All documents, records, materials including without limitation electronic documents, constituting reflecting or relating to any spills, leakage, overflow, or any other release of any of the Subject VOCs listed in number one above, that occurred at your business and/or on your property.
3. Copies of all documents exchanged between you and any state, federal, or local regulatory agency, including without limitation the Illinois Environmental Protection Agency, the Illinois Department of Public Health, the Illinois State Fire Marshall, or the DuPage County Health Department regarding or reflecting any spills, leakage, overflow, or any other release of any Subject VOCs at your property/facility, and/or regarding any violation(s) of environmental laws and/or regulations. Include any attachments that were sent or received with said correspondence.
4. Copies of any environmental memoranda, letters, reports, or documents prepared by environmental consultants hired by you or anyone else to perform any environmental investigations at your business and/or on your property, including but not limited to Phase 1 and/or Phase 2 investigations, or any other report relating to environmental conditions your facility.

5. Any environmental information relating to your business and/or property provided to any third party, including but not limited to any affiliates, parents, partners, subsidiaries, lenders, or other providers or potential providers of capital.
6. Copies of any and all documents referring or relating to any and all water well(s) located in, on, or under your property, generated at any time since the well(s) were initially planned/installed, including without limitation, any documents relating to:
 - (a) testing of the well(s) for any purpose;
 - (b) well logs;
 - (c) well historical documents;
 - (d) designs, drawings, diagrams, blue prints, and/or construction details of the wells;
 - (e) well maintenance;
 - (f) well pumps;
 - (g) well screens;
 - (h) well water quality;
 - (i) the presence of any contaminants found in water generated by the wells; and
 - (j) the source(s) of any contaminants found in the wells.